

## **REMARKS**

### **I. Introduction**

Claims 17–21 are added, and therefore claims 9–21 are pending in the present application. For at least the reasons set forth below, Applicants submit that the pending claims are in condition for allowance.

### **II. Objection to the Specification**

As regards the objection to the Substitute Specification, it is respectfully submitted that the amendments set forth above obviate the present objection. No new matter has been added, and support for the amendments can be found in the Substitute Specification, e.g., at page 1, line 4 to page 2, line 4. Withdrawal of this objection is therefore respectfully requested.

### **III. Rejection of Claims 9, 10 and 16 under 35 U.S.C. §102(b)**

Claims 9, 10 and 16 were rejected under 35 U.S.C. §102(b) as being anticipated by German Patent 198 29 730 (the “Berberich” reference).

Claim 9, as presented, reads as follows:

9. A control unit in a vehicle, comprising:  
*an integrated circuit;*  
a converter having an electrical isolation from a main electrical system of the vehicle, *wherein the converter is configured for supplying an electrically isolated supply voltage and an electrically isolated internal ground to the integrated circuit;* and  
at least one coupling element having an electrical isolation from the main electrical system, *wherein the coupling element is configured to transmit data to the integrated circuit.*

The Berberich reference fails to disclose (or even suggest) each element of independent claim 9, including at least the elements identified above. Specifically, the Berberich reference fails to disclose “*an integrated circuit of a vehicle control unit, wherein the integrated circuit is provided with an electrically isolated supply voltage and internal ground by an electrically isolated converter, and is also provided a data transmission by an electrically isolated coupling element,*” as explained in detail below.

The Berberich reference refers to a steering wheel assembly having a connecting device (ref. no. 1) connected to an interface 3 via a transmission path (ref. no. 2) having coils (ref. nos. 2a', 2a'', 2b', and 2b''). Coils 2a', 2a'' seemingly transmit data from the interface 3 to the connecting device 1, and coils 2b', 2b'' seemingly transmit power from the interface 3 to the connecting device 1. However, the transmission of data and power from the interface 3 to the connecting device 1, via the coils 2a/2b, is to entirely separate components of the interface 3, and therefore not to the same integrated circuit, as featured in claim 9 of the present application; the transmission of data in the Berberich reference appears to go to a modem (ref. no. 7), whereas the transmission of power does not go to this component, and instead appears to merely pass through the connecting device 1, to some other component not shown in FIG. 1. At any rate, the transmitted power does not go to the modem 7, which apparently receives the data transmission, and therefore the Berberich reference fails to disclose (or even suggest) the presently claimed feature of *an integrated circuit of a vehicle control unit, wherein the integrated circuit is provided with an electrically isolated supply voltage and internal ground by an electrically isolated converter, and is also provided with a data transmission by an electrically isolated coupling element.*

For at least the foregoing reasons, the teachings of the Berberich et al. reference would not anticipate claim 9, and therefore also not anticipate its dependent claims 10 and 16.

#### **IV. Rejection of Claims 11 and 12 under 35 U.S.C. §103(a)**

Claims 11 and 12 are rejected under 35 U.S.C. §103(a) as being unpatentable over the Berberich et al. reference in view of U.S. Patent No. 4,667,283 (hereinafter referred to as the "Seki et al." reference). The rejection should be withdrawn for at least the following reasons.

Claims 11 and 12 ultimately depend from claim 9. The Seki et al. reference has not been asserted to overcome, and does not overcome, the shortcomings of the Berberich et al. reference as applied against parent claim 9. Therefore, dependent claims 11 and 12 are allowable over the applied references.

**V. Rejection of Claim 13 under 35 U.S.C. §103(a)**

Claim 13 is rejected under 35 U.S.C. §103(a) as being unpatentable over the Berberich et al. reference in view of U.S. Patent No. 6,650,030 (hereinafter referred to as the “Has” reference). The rejection should be withdrawn for at least the following reasons.

Claim 13 depends from claim 9. The Has reference has not been asserted to overcome, and does not overcome, the shortcomings of the Berberich et al. reference as applied against parent claim 9. Therefore, dependent claim 13 is allowable over the applied references.

**VI. Rejection of Claim 14 under 35 U.S.C. §103(a)**

Claim 14 is rejected under 35 U.S.C. §103(a) as being unpatentable over the Berberich et al. reference in view of U.S. Patent No. 7,061,139 (hereinafter referred to as the “Young et al.” reference). The rejection should be withdrawn for at least the following reasons.

Claim 14 depends from claim 9. The Young et al. reference has not been asserted to overcome, and does not overcome, the shortcomings of the Berberich et al. reference as applied against parent claim 9. Therefore, dependent claim 14 is allowable over the applied references.

**VII. Rejection of Claim 15 under 35 U.S.C. §103(a)**

Claim 15 is rejected under 35 U.S.C. §103(a) as being unpatentable over the Berberich et al. reference in view of U.S. Patent No. 5,725,242 (hereinafter referred to as the “Belau et al.” reference). The rejection should be withdrawn for at least the following reasons.

Claim 15 depends from claim 9. The Belau et al. reference has not been asserted to overcome, and does not overcome, the shortcomings of the Berberich et al. reference as applied against parent claim 9. Therefore, dependent claim 15 is allowable over the applied references.

**VIII. New Claims 17-22**

Newly added claims 17 and 18 depend from independent claim 9, and are therefore allowable for the reasons already discussed above in regard to claim 9. Newly added independent claims 19 and 21 contain features similar to those discussed above in regard to independent claim 9, and therefore claims 19 and 21, as well as their newly added dependent claims 20 and 22, also allowable at least for the reasons already discussed above in regard to claim 9.

**CONCLUSION**

In light of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore respectfully requested.

Respectfully submitted,

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